

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

No. 1:19-md-2875-RBK
Hon. Robert Kugler
Hon. Joel Schneider

This document relates to:

All Actions

PLAINTIFFS' DISCLOSURE OF CANCER TYPES

Pursuant to CMO 22, Plaintiffs' Leadership discloses the following types of cancer for which Plaintiffs' Leadership intends to provide expert reports to proceed to the general causation Daubert hearing in the MDL: bladder, blood, breast, colorectal/intestinal, esophageal, gastric, kidney, liver, lung, pancreatic, pharyngeal, prostate and uterine cancers. Plaintiffs reserve the right to amend this disclosure.

Dated: December 31, 2020

Respectfully Submitted,

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MDL Plaintiffs' Co-Lead Counsel, on behalf of the Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2020, a true and correct copy of the foregoing was filed and served upon all counsel via operation of the CM/ECF system for the United States District Court for the District of New Jersey.

/s/ Daniel A. Nigh
Daniel A. Nigh